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## REMARKS

Claims 1-6 are now pending in this application. Claim 4 has been amended. Applicant respectfully submits no new matter has been added. Reconsideration is respectfully requested in view of the following remarks.

Claims 4 and 5 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,091,618 to Takahashi (Takahashi). The Office Action states that Takahashi discloses an IC card reader for usage with a smart card (7) to reduce card abrasion that includes: an open receptacle 6; a receptacle lip 6a, 6b extending over a lateral side of the receptacle and a portion of two adjoining longitudinal sides of the receptacle 3b; and a plurality of contacts residing within the receptacle, where the plurality of contacts connects to a smart chip 8. Claim 4 has been amended as set forth above to more clearly recite the subject matter of the present invention. Amended claim 4 now recites a composite receptacle lip that extends over the entire length of the lateral side of the receptacle. The Examiner equates the parallel stationary guide members 6a, 6b of Takahashi to the receptacle lip of amended claim 4, however the guide members 6a, 6b simply do not equate to the receptacle lip of amended claim 4. As shown in Takahashi the guide members 6a, 6b extend along the longitudinal sides of the IC card 7. The guide members 6a, 6b fail to extend along the entire length of a lateral side of the IC card 7, in contrast to the receptacle lip of amended claim 4. Although the Examiner refers to protrusion 3b of Takahashi to further support disclosure of the receptacle lip, this protrusion 3b merely abuts merely a portion of the lateral side of IC card 7 and primarily assists in the displacement of spring frame 2. This protrusion 3b simply does not equate to the composite receptacle lip of amended claim 4 that extends along an entire lateral side to the smart card. Clearly the IC card reader of Takahashi does not equate to the card reader as recited in amended claim 4. Applicant, therefore, respectfully submits that Takahashi cannot support this 102 rejection of claims 4 and 5, and

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requests withdrawal of this rejection.

Claims 1-3 and 6 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Takahashi in view of U.S. Patent No. 5,511,986 to Casey et al. (Casey). In support of this rejection, the Examiner relies upon Takahashi for disclosing an IC card reader that includes: an open receptacle; a plurality of contacts residing within the receptacle; a contact plate that includes the plurality of contacts and a plurality of electrical leads on the contact plate. The Office Action states that Takahashi however fails to disclose at least one placement tab that extends from the first lateral wall, second lateral wall and longitudinal wall into the receptacle to secure placement of the smart card.

The Examiner relies upon Casey for disclosure of the placement tabs as recited in claims 1 and 6 of the present invention. The Examiner loosely states that the guide grooves 28 of Casey provide sufficient teaching to somehow render the placement tabs of claims 1 and 6 obvious. To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). The present obviousness rejection simply does not provide any prior art which discloses or teaches the placement tabs as recited in claims 1 and 6. Casey discusses grooves 28 that define a pathway. By definition, groove means "a long, narrow furrow or channel". The placement tabs as recited in claims 1 and 6 clearly are not shown or described as long narrow channels nor do the placement tabs create such. Applicant respectfully submits that the combination of Takahashi and Casey fails to disclose each and every element of claims 1-3 and 6, where claims 2 and 3 depend from claim 1. Applicant, therefore, requests withdrawal of this rejection based upon the foregoing.

American Heritage Dictionary, 1976.

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## **CONCLUSION**

Based upon the foregoing amendment and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Prompt allowance of all pending claims is therefore requested.

Respectfully submitted,

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